RELEASE INSTRUCTIONS (RI)

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TO: TITLE: Environmental Compliance DEBRA A ISOM H6-08 Release No.: 88 0413V Date Prepared: October 11, 1996 I have entered this release into the document per If you have any questions about this release contact: R. J. Swan instructions. 00 Phone: 376-0967 Signature Date

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IMPLEMENTATION NOTICE

Some words were inadvertently left out on the last release. The appropriate words have been added. These changes are considered minor, therefore, no company review was required.

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Regulated Substance Management

- 1. Management of items and materials containing PCBs is per 40 CFR 761 if over 50 ppm PCBs and WAC 173-303 regulations, if between 2 and 50 ppm PCBs.
- 2. All oil-filled electrical equipment other than circuit breakers, reclosers, and cables whose PCB concentration is unknown must be handled and controlled as PCB-contaminated, unless the equipment has been certified as non-PCB.
 - <u>IF</u> any transformer is tested and found to contain greater than 500 ppm PCB, <u>THEN</u> follow the requirements of 40 CFR 761.30(a)(1)(xv).
- 3. <u>IF</u> a spill or release of any amount of PCBs occurs, <u>THEN</u> report as required by Section 5.0 of this manual.
 - a. <u>IF</u> assistance is needed to cleanup the PCB spill/release, contact ICF KH Utilities.
 - b. <u>IF</u> the initial PCB concentration is greater than or equal to 50 ppm, <u>THEN</u> initiate cleanup within 24 hours, <u>OR</u>:
 - <u>IF</u> the spill is of low-concentration, or leaks involving less than one pound of PCBs by weight, or less than 270 gallons of untested mineral oil, <u>THEN</u> complete cleanup within 48 hours of discovery per 40 CFR 761, Subpart G.
- 4. Label (clearly) PCBs and PCB Items including PCB transformers and rectifiers listed in 40 CFR 761.40 with the large PCB mark (M_L) (yellow label). <u>IF</u> the item is too small to accommodate the smallest size M_L, <u>THEN</u> use a smaller PCB mark (M_S).
- 5. Prepare and maintain the PCB Annual Document Log and PCB Annual Report as required by 40 CFR 761.180.
- 6. Inspect the following as required by 40 CFR 761.30 and 40 CFR 761.65:
 - a. PCB transformers (>500 ppm PCBs) in service or in storage for reuse at least every 3 months provided there is a minimum of 30 days between inspections.
 - <u>IF</u> the transformers are in storage for disposal, <u>THEN</u> inspect at least monthly. <u>IF</u> the transformer is leaking, <u>THEN</u> inspect it daily until the leak is repaired or the transformer is disposed.
 - b. PCB-contaminated transformers/rectifiers (>50 ppm but <500 ppm PCBs) at least annually with a minimum of 180 days between inspections.
 - <u>IF</u> the transformers/rectifiers are in storage for disposal, <u>THEN</u> inspect monthly, as a minimum.
 - c. PCB-contaminated electrical equipment in storage for disposal: monthly, as a minimum.

Regulated Substance Management

- d. Large PCB capacitors (>500 ppm PCB) and PCB-filled electromagnets (>500 ppm PCB) in storage for disposal: monthly, as a minimum.
- e. PCB and PCB-contaminated items outside of an approved storage facility awaiting disposal: weekly, as a minimum.
- f. Approved storage facility floors and curbs for signs of cracks, cuts, or significant deterioration: monthly, as a minimum.
- 7. Maintain records of sampling, retrofilling, inspection, and spill response for all PCB and PCB-contaminated hydraulic and heat transfer systems as required by 40 CFR 761.180.

<u>IF</u> the records are for nonradioactive items, <u>THEN</u> forward copies to ECO responsible for project, or facility.

<u>IF</u> the records are for radioactive items, <u>THEN</u> forward copies to WHC Solid Waste Management, quarterly.

- 8. PCB storage requirements are as follows per 40 CFR 761.65:
 - Facility criterion for storing PCB and PCB items designated for disposal: 40 CFR 761.65(b)(1).
 - Items that can be stored in areas not complying with 40 CFR 761.65(b)(1), for up to 30 days: 40 CFR 761.65(c)(1), on condition that a notation is attached to the service.
- 9. Store all radioactive PCB waste at the Hanford Central Waste Complex. *Do not* store radioactive PCB waste for longer than 30 days outside the Hanford Central Waste Complex. Drums containing radioactive PCBs at a concentration greater than 499 ppm must be moved into CWC immediately.
- 10. Certain wastes containing PCBs in concentrations greater than or equal to 2 ppm may be regulated under WAC 173-303 as a dangerous or mixed waste. See Section 7.6 of this manual for information on the waste designation process. There are some wastes that will require management under both TSCA and Ecology's state RCRA program.
- 11. Transport and dispose of PCB and PCB items per the applicable requirements per 40 CFR 761.40(b), 761.45, 761.60 and 761.65(c)(b).
- 12. <u>IF</u> an exception report is required from an offsite storage or disposal facility, <u>THEN</u> follow the sections described in 40 CFR 761.215 for report submittal, as required.
- 13. Receive and maintain Certificates of Disposal records for each shipment of PCB waste.
- 14. Washington State Dangerous Waste regulations cover Intact and nonleaking PCB small capacitors and PCB light ballasts. Handle these items as a dangerous waste or as a PCB waste.

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IMPLEMENTATION NOTICE

Minor editorial changes were made throughout this procedure including updating current organizational names and deleting text referring to "Best Management Practices." Also, a revision that authorizes ECOs to review and approve Excavation Permits within the physical boundries of their facilities was added.

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12.1 Purpose

The purpose of this section is to describe and delineate the requirements for the preservation of historical and cultural resources and for the protection of plant and wildlife species on the Hanford Site that have been given special status designations (endangered, threatened, state and federal candidate). Critical habitats identified for these species are also to be protected.

12.2 Scope

The provisions of this section apply to alterations of land or structures (including maintenance and repair) and to modifications of habitat that may adversely affect endangered, threatened, state and federal candidate plant or wildlife species.

12.3 Historical and Archaeological Preservation

Requirements and guidelines are provided for the preservation of historical sites, cultural resources, and archaeological data on the Hanford Site. Federal, state, local statutes and directives, and their pursuant regulations govern the renovation, excavation, demolition, or other alterations in connection with WHC activities.

Provisions apply to the renovation, routine repair and maintenance, and demolition, excavations, surface soil stabilization, or other alterations of lands on the Hanford Site.

12.3.1 Responsibilities

- 1. Facility managers/landlords shall:
 - a. Obtain an excavation permit prior to any excavation project.
 - b. Obtain appropriate cultural resource review (CRR) prior to initiating any surface-disturbing activities onsite or prior to excessing land.
 - c. Obtain an historical resources clearance (HRC) prior to renovating/repairing/demolishing facilities.
- 2. Project managers/engineers and/or cognizant engineers shall:

Submit a request for a CRR, accompanied by a map identifying the area in question, to the manager of Hanford Cultural Resources Laboratory (HCRL), Pacific Northwest Laboratories (PNL) prior to any potential surface-disturbing activities onsite or excessing land.

3. Either Environmental Compliance Officers or Near-Field Monitoring (NFM) shall evaluate and approve excavation permits prior to excavation to ensure CRR completion and compliance. Environmental Compliance Officers may review and approve excavation permits only within the physical boundaries of the facility for which they have responsibility.

- Cultural and historic resources are managed by the Environmental Assurance and 4. Policy Division of the U.S. Department of Energy, Richland Field Office (RL) which discharges that responsibility through all site contractors, including WHC, PNL, and BHI.
 - Contractors must receive HRCs prior to making major renovations, repairs or a. modifications to or demolishing facilities onsite. The Westinghouse Principal Historian has a form that can be used for getting a building or structure permanently cleared for historical resource purposes. Additional information on HRCs can be found on the HLAN under Hanford Information in the file: "NEPA site-wide Categorical Exclusions on the Hanford Site."
 - Contractors must obtain clearance letters (in lieu of approval of excavation b. permit) prior to initiation of any excavation project, excessing land or renovating and/or repairing facilities, or demolishing facilities onsite.

12.3.2 Requirements

1. HRCs shall be conducted prior to any site demolishing or remodeling and in accordance with item 4 above.

36 CFR 800, 36 CFR 63, 16 USC 470 et. seq., 16 USC 461-467, and BASIS: 42 USC 4321.

2. CRRs shall be conducted prior to projects which will cause ground disturbance in previously undisturbed areas, except within and 150 meters outside of tank farm areas. Tank farm activities shall be monitored for cultural resources when deemed necessary.

BASIS: 36 CFR 800, 36 CFR 65, 16 USC 470aa-470aa-11, and 42 USC 1996.

3. For routine repair, maintenance, and facilities upgrades where ground disturbance is anticipated, requests for an excavation permit shall be made as soon as the scale and location of the project are known. Allow at least 30 days for completion of the review.

BASIS: To ensure compliance with 36 CFR 800 and 16 USC 470 et seq.

4. To obtain a CRR, the initiator should contact the HCRL and provide a completed Request for Cultural and Ecological Resources Review form. The form is available as a Macro GEF271.

BASIS: To ensure compliance with 36 CFR 800.3, Subpart B, "The Section 106 Process."

5. To obtain a HRC, the initiator should contact the WHC Historian.

> To ensure compliance with 36 CFR 800.3, Subpart B, "The Section 106 BASIS: Process."

For new construction or earth disturbance, CRRs shall be requested in the site-selection 6. phase of planning so that impacts on cultural resources can be considered in the evaluation of alternative sites. The request should be made no later than the conceptual design review stage to avoid potential impact to construction schedules.

To ensure compliance with 36 CFR 800, 43 CFR 7, BASIS: 16 USC 470aa-470aa-11, and 42 USC 1996.

- 7. Two types of activities shall be exempt from resource reviews:
 - Excavations within and 150 meters outside of existing tank farm areas will not require CRRs. However, tank removals and major modifications to permanent structures in these areas will require individual HRCs.
 - b. Emergency repair work that is necessary to safeguard public/worker health and safety will not require CRRs or HRCs. Emergencies include but are not limited to, breaks in waste containment facilities and leaks in lines carrying emergency water or dangerous substances.

12.4 Plant and Wildlife Species on the Hanford Site

Requirements and guidelines are provided for the protection of plants and animals that have been given special status designations (endangered, threatened, state and federal candidate) by the federal or state government agencies (i.e., U.S. Fish and Wildlife Services, Washington State Department of Wildlife). Critical habitats identified for these species are also protected. The provisions apply to modifications of habitat that may adversely affect special status plants and animals, including but not limited to removal/remedial actions, corrective actions, decontamination and decommissioning (D & D) activities, and construction project activities.

The provisions of this section also apply to the taking, possession, transportation, sale, purchase barter, exportation, and importation of the special status plants and animals (whether living or dead) (50 CFR 17, Endangered and Threatened Wildlife and Plants).

Provisions of this section also apply to facility-specific environmental monitoring of wildlife and the introduction of exotic species of plants (e.g., study purposes, stabilization activities) to the Hanford Site.

12.4.1 Responsibilities

12.4.1.1 Operations/project managers shall

- 1. Review project plans, work plans, etc., and consult with NFM before initiating activities to ensure there will be no significant disruption or loss of special status wildlife and habitat resources.
- 2. Prior to excavation, when required, obtain an ecological review from PNL environmental Services by submitting a Request for cultural and Ecological Resources Review form (Macro GEF271). In general, ecological reviews are not required for

work done in or on buildings, in landscaped areas and lawns, and on parking lots and graveled/sprayed areas. However, some abandoned buildings may house bat species of concern and will require ecological reviews.

- 3. Contact NFM for approval to introduce any plant or animal species onsite. This includes organisms introduced for the purposes of soil stabilization/revegetation, landscaping, or pest control. Additional documentation may be required under the National Environmental Policy Act (NEPA). (See Section 4.0 of this manual).
- 4. Notify ES early in the planning stages of activities (e.g., site selection) that may potentially affect special status plant and animal species or critical habitat. Threatened and Endangered (T&E) surveys may be reveal the presence of T&E species of priority habitat which could affect site selection or the timing of activities.

12.4.1.2 Employees of WHC shall

Notify NFM, Pest Control or Hanford Patrol of any animal such as deer, elk, coyotes, and raptors (i.e., eagles, owls, hawks), found hurt or dead on the Hanford Site.

12.4.1.3 Near-field monitoring (NFM) shall

- 1. Ensure ecological reviews which are done to evaluate the impact of construction projects on special status plant and animal species are completed and requirements are implemented, prior to approving excavation permits.
- 2. Coordinate monitoring activities at WHC facilities and associated waste sites for special status plant and animal species.
- 3. Serve as the point of contact for special status plant and animal species survey activities.
- 4. Evaluate and approve excavation permits as requested to ensure environmental documentation is in place and requirements are implemented. For more specific instructions on excavation permits, see WHC-CM-8-7, Site Support Services, Section 503.1, "Performing Excavation Activities."
- 5. Interface with other contractors and DOE regarding the Bald Eagle Site Management Plan (DOE/RL-94-150) for the Hanford Site to protect valuable eagle habitat and encourage propagation of the species. This assessment plan is required for those activities that involve lands within or near a bald eagle nest or communal night roost.
- 6. Interface with other contractors and DOE regarding the ecological review for Threatened and Endangered Wildlife Species Related To CERCLA Activities (WHC-EP-0513). This assessment is required for those characterization activities that may potentially affect special status plant and animal species.

- Report in writing, the wildlife collection, including contamination analyses, to 7. designated state or federal agencies (i.e., U.S. Fish and Wildlife Service) for proper notification.
- 8. Obtain the appropriate salvage permits for WHC.

12.4.1.4 Environmental Field Services Animal Control Operations (ACO) shall

- Maintain a Nuisance Wildlife Control (NWC) Permit as provided by the Washington 1. State Department of Wildlife.
- Provide an annual report to the Washington State Department of Wildlife according to 2. the criteria of the NWC Permit to include all Hanford Site wildlife species controlled by ACO.
- 3. Provide WHC NFM with a copy of the annual ACO NWC report.

12.4.1.5 **Environmental Compliance Officers shall**

- Use the procedure in WHC-CM-7-4, Section 15, Rev 0 when evaluating excavation 1. permit requests for compliance with NEPA, Biological Reviews, Cultural Resource Reviews, the National Pollutant Discharge Elimination System, and the Hanford Site Bald Eagle Management Plan. (WHC NFM may be contacted for a copy of this procedure.)
- 2. When required, notify the National Park Service of proposed work within the Hanford Reach Study Area.

12.4.2 Requirements

1. Monitoring (nondestructive monitoring) for contamination as specified in Section 5.4 of this manual shall be conducted for special status plant and animal species.

BASIS: DOE 5400.1, General Environmental Protection Requirements.

Ensure the potential impacts of any major construction project or removal/remedial 2. action activities on special status plant and animal species have been assessed and requirements implemented.

BASIS: T6 USC 1531, Section 4(a)(A).

Ensure surveys of special status plant and animal species in support of the NEPA 3. documentation process are conducted and requirements implemented.

BASIS: 50 CFR 402.6, and coordination with other environmental reviews.

4. Ensure ecological review is done if special status plant and animal species may be present in the area affected by any major construction project or removal/remedial action activities on the Hanford Site are conducted and requirements implemented.

BASIS: 16 USC 1531, Endangered Species Act (ESA), Section 7(c) and

50 CFR 17, "Endangered and Threatened Wildlife and Plants."

5. No exotic plant or animal species shall be introduced, including those introduced for the purposes of soil stabilization or revegetation, pest control, or landscaping, without prior review and approval of NFM.

BASIS: Executive Order 11987, WAC 232-12-017.

6. When special status plant and animal species and/or their habitat may be destroyed or disrupted by WHC activities (remedial/removal action, corrective action, construction project, etc.), WHC shall consult with the Fish and Wildlife Service (FWS) and/or the National Marine Fisheries Service (NMFS) before engaging in such activities.

BASIS: 50 CFR 402.6; 16 USC 1531, Section 7(a)(2); and 16 USC 661.

7. Obtain appropriate federal and/or state permits or approvals authorizing such activity when taking (or otherwise reducing to possession of) any animal, or part thereof, living or dead.

BASIS: WAC 232-12-275, WAC 232-12-064, WAC 232-12-276.

WAC 232-12-287, and 50 CFR 17.21, Subpart C, "Endangered

Wildlife."

8. On routine basis, conduct environmental monitoring of all environmental media (air, biota, etc.) around facility perimeters.

BASIS: DOE 5400.5 and DOE/EH-0173T.

9. Obtain an agreement with the Washington State Department of Wildlife for controlling nuisance or problem wildlife.

BASIS: WAC 232-12-086, "Requirements for Agreements to Control Nuisance or Problem Wildlife."

10. Report annually (in accordance with approved agreements) all Hanford Site wildlife species controlled to the Washington State Department of Wildlife.

BASIS: WAC 232-12-086 and WAC 232-12-197.

12.5 Designated Reviewing Organizations

Organizations listed below are responsible for this process. If you have any questions about this procedure, please contact the process owner.

Designated Reviewing Organizations

CMPOC

Environmental Services

PSO/ES

12.6 References

NOTE: For additional references, see Appendix B of this manual.

50 CFR 17, Endangered and Threatened Wildlife and Plants, Subpart B.

DOE/RL-94-150, Bald Eagle Site Management Plan for the Hanford Site.

WHC-CM-4-1, Emergency Plan.

WHC-CM-7-4, Operational Environmental Monitoring.

WHC-CM-8-7, Site Support Services.

Table 12-1. Bases/Driver.

Regulatory	Drivers	Other Drivers	WHC-CM-7-5 Implementing	Comments
Federal	State/Local		Subsection	
36 CFR 800 36 CFR 63, 16 USC 461-470aa 42 USC 1996 and 4321 43 CFR 7	N/A	N/A 	12.3.2	Preservation of historically significant resources
50 CFR 17	N/A	DOE/RL-91-150	12.4.1.1	Bald Eagle Site Management Plan
16 USC 1531 50 CFR 17 50 CFR 402.6	WAC-232-12	DOE 5484.1	12.4.2	Protection of threatened and endangered plants and animals
N/A	WAC 232-12-017	E0 11987	12.4.2	Keeping exotic plants and animals offsite
50 CFR 17, Sub. C	WAC 232-12-064, 086, 274, 276, 287	DOE 5400.5 DOE/EH 0173T	12.4.2	Taking of wildlife
N/A	WAC-12-086, 197	N/A	N/A	Report on wildlife control efforts

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PAGE 1 OF 1

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IMPLEMENTATION NOTICE

Place this Management Directive at the front of this manual.

FDH-MD-001, Adoption of WHC Documents

Fluor Daniel Hanford		FDH-MD-001
Management Directive	Revision:	0
	Page Number:	1 of 3
	Effective Date:	October 1, 1996
Subject:	Approved by:	
Adoption of WHC Documents	Attel	
	H.J. Hatch, President &	: CEO
	Fluor Daniel Hanford	

Effective October 1, 1996, FDH adopts the specific Westinghouse Hanford Company (WHC) controlled manuals and other documents listed in Appendix A for interim use. This ensures continued safe site operations, while the process of streamlining site manuals and procedures continues. In addition, existing preprinted forms referenced in these manuals and used elsewhere on the site will be used by FDH and its subcontractors. In most cases Westinghouse Hanford Company or WHC can be interpreted to mean Fluor Daniel Hanford or FDH in the forms, manuals and procedures. However, in some cases a function previously performed by WHC will now be performed by one of FDH's subcontractors and that company will issue implementing instructions.

It is the intent of Fluor Daniel Hanford (FDH) to introduce commercial work practices and standards to the maximum extent practical, while complying with applicable requirements. We are committed to streamlining work through use of necessary and sufficient processes and protecting the safety and health of workers and the public.

Requirements and procedures applicable to FDH and its subcontractors will be promulgated by FDH through the controlled manual system. In addition, FDH will use the controlled manual system to document operating procedures for various management and integration functions. The major subcontractors will issue appropriate procedure documents covering their individual work scopes.

The procedure under which this Management Directive is being issued (see Procedure 2.9, Management Directives, in WHC-CM-3-6) provides a system for rapid communication of interim policy or procedure changes. The system is used in situations where new or changed requirements must be immediately implemented, while the affected controlled document undergoes the formal revision process.

The process of revising the controlled manuals will begin immediately; however, it will take several months to complete the revisions. It is recognized that the management and integration contract structure, new contractor entities and revised organization titles will create some uncertainty in applying the existing WHC manuals. During the interim manual revision period, consult your supervisor or manager to resolve conflicts and inconsistencies. Your patience is appreciated in dealing with the temporary inconveniences that will occur during this interim period.

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Management Directive
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Adoption of WHC Documents
Effective Date: October 1, 1996

APPENDIX A. WHC DOCUMENTS ADOPTED BY FDH

LEVEL II MANUALS:

WHC-CM-1-3	Management Requirements and Procedures
WHC-CM-1-4	Corrective Action Management Manual
WHC-CM-1-5	Standard Operating Practices
WHC-CM-1-8	Work Management Manual
WHC-CM-1-10	Safety Manual
WHC-CM-1-11	Industrial Hygiene Manual
WHC-CM-2-1	Procurement Manual and Procedures
WHC-CM-2-2	Materials Management Manual
WHC-CM-2-3	Property Management Manual
WHC-CM-2-5	Management Control System
WHC-CM-2-14	Hazardous Material Packaging and Shipping
WHC-CM-2-15	Training Standards
WHC-CM-3-4	Information Release Administration
WHC-CM-3-5	Document Control and Record Management Manual
WHC-CM-3-6	Uniform Publications System
WHC-CM-3-10	Software Practices
WHC-CM-4-2	Quality Assurance Manual
WHC-CM-4-7	Unclassified Computer Security
WHC-CM-4-27	Radiological Control Practices and Procedures
WHC-CM-4-29	Nuclear Criticality Safety Manual
WHC-CM-4-33	Security Manual
WHC-CM-4-40	Industrial Hygiene Manual
WHC-CM-4-41	Fire Protection Program Manual
WHC-CM-4-43	Emergency Management Procedures
WHC-CM-4-46	Safety Analysis Manual
WHC-CM-6-1	Standard Engineering Practices
WHC-CM-6-2	Project Management
WHC-CM-7-5	Environmental Compliance
WHC-CM-8-7	Operations Support Services

LEVEL III MANUALS:

WHC-CM-2-7 WHC-CM-2-8 WHC-CM-2-9 WHC-CM-2-10 WHC-CM-2-11 WHC-CM-2-18 WHC-CM-3-1 WHC-CM-4-5 WHC-CM-4-6 WHC-CM-4-14 WHC-CM-4-16	counts Payable Manual ccounts Receivable Manual ash Control Manual ost Accounting Manual eneral Ledger Manual andard Services Manual formation Resource Management Administration uality Assurance Qualifications and Instructions ompliance Assurance pplied Radiological Controls osimetry and Medical Services Manual afeguards Material Control Manual
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FDH-MD-001 Fluor Daniel Hanford Company Revision: Management Directive Page Number: 3 of 3 Effective Date: October 1, 1996 **Adoption of WHC Documents**

Welding Manual WHC-CM-6-10

Projects Department Procedures WHC-CM-6-12

OTHER DOCUMENTS:

HSRCM-1	Hantord Site Radiological Control Manual
WHC-IP-0718	Health Physics Technical Practices and Procedures
WHC-IP-1026	Engineering Practice Guidelines
WHC-IP-1037	Operations Security
WHC-IP-1116	Counterintelligence
WHC-SP-1131	Quality Assurance Program and Implementation Plan

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Fluor Daniel Hanford

Management Directive

Revision:
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FDH-MD-001

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Adoption of WHC Documents

October 1, 1996

APPENDIX A. WHC DOCUMENTS ADOPTED BY FDH

LEVEL II MANUALS:

LEVEL III MANUALS:

Property and Inventory Accounting Manual
Accounts Payable Manual
Accounts Receivable Manual
Cash Control Manual
Cost Accounting Manual
General Ledger Manual
Standard Services Manual
Information Resource Management Administration
Quality Assurance Qualifications and Instructions
Compliance Assurance
Applied Radiological Controls
Dosimetry and Medical Services Manual
Safeguards Material Control Manual

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WHC-CM-6-10 WHC-CM-6-12

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